

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:01CR374 CAS
)	
HAISSAM A. NASHAR,)	
)	
Defendant.)	

**GOVERNMENT’S MOTION TO UNSEAL COURT RECORDS
AND ALLOW THIS ATTORNEY TO OBTAIN A COPY OF THE
PLEA AGREEMENT AND RELATED DOCUMENTS**

COMES NOW the United States of America, by and through Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Michael W. Reap, Assistant United States Attorney for said District and states the following to this Honorable Court:

1. A motion has been filed by defense counsel in a federal prosecution in the Western District of North Carolina. Sentencing on that case is set for November 16, 2010.
2. This attorney today, for the first time, received a copy of this motion and a court order from the Hon. Charles A. Shaw to respond to this motion by November 2, 2010.
3. This attorney was not the trial attorney who was David Rosen and has since retired from the U.S. Attorney’s Office, Eastern District of Missouri.

WHEREFORE, the government respectfully requests leave to unseal court documents to obtain a copy of the plea agreement, any motions for downward departure and a copy of any

other court records which are sealed in order to answer this pretrial motion filed on behalf of the defendant in a federal prosecution in the Western District in North Carolina.

Respectfully submitted,

RICHARD G. CALLAHAN
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s/ Michael W. Reap
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